

**Exhibit 1**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

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) Chapter 9

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) Case No. 13-53846

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) Hon. Steven W. Rhodes

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**ORDER GRANTING MOTION *IN LIMINE* TO PRECLUDE DEBTOR  
FROM OFFERING EVIDENCE RELATING TO (A) THE RECOVERIES  
OF CLASSES 10 AND 11 INDEPENDENT OF THE FUNDS FROM THE  
DIA FUNDING PARTIES AND THE STATE AND (B) THE TOPICS  
IDENTIFIED IN SYNCORA’S SUBPOENAS TO THE FOUNDATIONS**

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This matter having come before the Court on Syncora’s Motion *in Limine* to Preclude the Debtor from Offering Evidence Relating to (a) the Recoveries of Classes 10 and 11 Independent of the Funds from the DIA Funding Parties and the State and (b) the Topics Identified in Syncora’s Subpoenas to the Foundations (the “Motion”), the Court having reviewed Syncora’s Motion, and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. Syncora’s Motion is GRANTED.
2. The City is barred from introducing evidence relating to:

(a) the City's contention that funds received from the DIA Funding Parties and the State are "outside the Plan" and should be excluded from the Court's unfair discrimination analysis; and

(b) the topics identified in Syncora's subpoenas to the Foundations.

3. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**IT IS SO ORDERED.**